

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

KATHRYN HENDRIX,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No: 2:21-cv-00300-MHH
CRC INSURANCE SERVICES,)	
INC., TRUIST FINANCIAL)	
CORP., AND TRUIST BANK,)	UNOPPOSED
)	
Defendants.)	

**DEFENDANTS' MOTION TO FILE PAGES AND EXHIBITS OF
SUMMARY JUDGMENT BRIEF UNDER SEAL**

Defendants request the court allow it to file exhibits and pages of its Brief in Support of Summary Judgment under seal. In support of their motion, Defendants state as follows:

1. Plaintiff has produced in discovery mental health records from her psychiatrists and therapists.
2. The records contain Plaintiff's medical diagnoses and sensitive personal information regarding Plaintiff and were produced labeled confidential pursuant to the protective order in place in this matter, doc. 20. Under the court's Protective Order, these records are to be filed under seal. (Doc. 20, p. 4)

3. Defendants have produced confidential and proprietary pay information of third parties not before the court. Defendants have produced this information labeled confidential to protect the privacy of those individuals and prevent disclosure of the information to Defendants' competitors.

4. Pursuant to the court's Protective Order, Defendants seek to file this information under seal. (*Id.*)

5. Accordingly, Defendants request the court permit Defendants to file exhibits and pages of its summary judgment brief containing data or information from Plaintiff's mental health records or pay information under seal.

Respectfully submitted this the 8th day of May 2024.

/s/ Rachel V. Barlotta
RACHEL V. BARLOTTA
KAYLA M. WUNDERLICH
Attorneys for Defendants

OF COUNSEL:

BAKER DONELSON BEARMAN
CALDWELL & BERKOWITZ, P.C.
1901 Sixth Avenue North, Suite 2600
Birmingham, AL 35203
(205) 328-0480 Telephone
(205) 322-8007 Facsimile
rbarlotta@bakerdonelson.com
kwunderlich@bakerdonelson.com

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and accurate copy of the foregoing by filing the same via the court filing system and/or via electronic or U.S. Mail, first-class postage pre-paid, on all counsel of record on May 8, 2024.

Leslie Palmer
Palmer Law, LLC
104 23rd Street South, Suite 100
Birmingham, Alabama 35233
Tel: (205) 285-3050
leslie@palmerlegalservices.com

Cynthia F. Wilkinson
Wilkinson Law Firm
1717 3rd Avenue North, Suite A
Birmingham, Alabama 35203
wilkinsonefile@wilkinsonfirm.net

Patricia A. Gill
Barrett & Farahany
2 20th Street N, #900
Birmingham, AL 35203
trish@justiceatwork.com
Tel: (205) 390-1953

/s/ Rachel V. Barlotta

Of Counsel